

**From:** [Speer, R. Taylor](#)  
**To:** [Neinast, William A.](#); [Placey, Sean](#); [Jacobik, Jenna](#)  
**Subject:** Fwd: [EXT] Fwd: Mr Tate  
**Date:** June 15, 2023 8:51:56 AM

---

R. Taylor Speer  
Counsel  
Fox Rothschild LLP  
864-751-7665

---

**From:** Lawrence Davis <[lawrence@poseidonsecuritygroup.com](mailto:lawrence@poseidonsecuritygroup.com)>  
**Sent:** Thursday, June 15, 2023 8:43 AM  
**To:** Speer, R. Taylor <[TSpeer@foxrothschild.com](mailto:TSpeer@foxrothschild.com)>; [ap@blockquarry.io](mailto:ap@blockquarry.io) <[ap@blockquarry.io](mailto:ap@blockquarry.io)>  
**Subject:** [EXT] Fwd: Mr Tate

----- Forwarded message -----

From: **Litchain Corp** <[litchaincorp@gmail.com](mailto:litchaincorp@gmail.com)>  
Date: Thu, Jun 15, 2023 at 8:13 AM  
Subject: Re: Mr Tate  
To: Beau Bartch <[beau@poseidonsecuritygroup.com](mailto:beau@poseidonsecuritygroup.com)>  
CC: Amie Hulme <[amie@poseidonsecuritygroup.com](mailto:amie@poseidonsecuritygroup.com)>, Lawrence Davis <[lawrence@poseidonsecuritygroup.com](mailto:lawrence@poseidonsecuritygroup.com)>, Saar Waisman <[saar@poseidonsecuritygroup.com](mailto:saar@poseidonsecuritygroup.com)>

It would appear that you are attempting to render service at an invalid address, in Apopka FL for Litchain Corp.

As we we can make arrangements to receive service on July 5th once I am back in Gaffney SC, or Columbia SC.

After Litchain Corp has read thru what appears to be the notes of this case, we will be advising legal counsel for Litchain Corp to receive service on or after July 5th.

That is more than likely the reason you have been attempting to serve Litchain Corp, it is an improper address as that is a rental property of one of our principals.

Sincerely,  
LITCHAIN CORP

On Thu, Jun 1, 2023 at 13:37 Beau Bartch <[beau@poseidonsecuritygroup.com](mailto:beau@poseidonsecuritygroup.com)> wrote:

Mr Tate

Please see below our attempts to reach you on this matter. We are happy to meet you wherever is convenient to expedited the process for yourself and our client.

<b>EXHIBIT B</b>
----------------------

Party To Be Served: Litchain Corp.

Case Info: Case Number: 7:23-CV-01427-TMC County: State: South Carolina Court: District  
Caption: Blockquarry Corp. f/k/a I vs. Litchain Corp. and Gaffne

See our attempts below and our server notes

We have exhausted all of our attempts at this address... please advise

Comments regarding this job:

6/1/2023 7:48 AM Attempted service at [1056 Lakeside Estates Dr, Apopka, FL 32703](#)

Dogs inside, cars there, no answer

5/25/2023 7:04 PM Attempted service at [1056 Lakeside Estates Dr, Apopka, FL 32703](#)

Garage open, truck there, could see 2 white males upstairs who looked at me but would not respond, didn't see any black males that fit Tony's appearance

5/24/2023 4:21 PM Attempted service at [1056 Lakeside Estates Dr, Apopka, FL 32703](#)

Honda there, truck gone, dogs inside

5/23/2023 7:48 AM Attempted service at [1056 Lakeside Estates Dr, Apopka, FL 32703](#)

Dogs inside, Honda#LEZG53, dodge #AL85CF, been here before to try and serve but don't remember the def name, never made contact

5/20/2023 9:01 AM Attempted at [1056 Lakeside Estates Dr, Apopka, FL 32703](#)... no answer at door no sounds from inside and no cars in the drive... large house with 2 car garage

On Tue, May 30, 2023, 17:10 Lawrence Davis <[lawrence@poseidonsecuritygroup.com](mailto:lawrence@poseidonsecuritygroup.com)> wrote:

Hello,

I am trying to personally service Litchain with a copy of the complaint and summonses in this case:

7:23-cv-01427-TMC, pending in the U.S. District Court for the District of South Carolina, and that you would like to meet Mr. Tate in Florida for that purpose.

I have CC'd my director of Operations in this correspondence as well, and we're happy to meet you wherever is easiest to expedite the process for yourself and our clients.

If you've any questions, please don't hesitate to reach out. We've already made previous attempts and will continue to do so.

Lawrence Davis

President

Cell: +1 (954) 661-2109

Email: [Lawrence@poseidonsecuritygroup.com](mailto:Lawrence@poseidonsecuritygroup.com)

Web : [www.poseidonsecuritygroup.com](http://www.poseidonsecuritygroup.com)



Disclaimer:

This email is intended only for the person to whom it is addressed and/or otherwise authorized personnel. The information contained herein and attached is confidential and the property of Poseidon Security Group. If you are not the intended recipient, please be advised that viewing this message and any attachments, as well as copying, forwarding, printing, and disseminating any information related to this email is prohibited, and that you should not take any action based on the content of this email and/or its attachments.

--

Litchain Corp

[3415 W Lake Mary Blvd Suite 950702 Lake Mary, FL 32795](http://www.LitchainCorp.com)

(PH) +1.407.476.6115

[www.LitchainCorp.com](http://www.LitchainCorp.com)

--

Lawrence Davis

President

Cell: +1 (954) 661-2109

Email: [Lawrence@poseidonsecuritygroup.com](mailto:Lawrence@poseidonsecuritygroup.com)

Web: [www.poseidonsecuritygroup.com](http://www.poseidonsecuritygroup.com)



Disclaimer:

This email is intended only for the person to whom it is addressed and/or otherwise authorized personnel. The information contained herein and attached is confidential and the property of Poseidon Security Group. If you are not the intended recipient, please be advised that viewing this message and any attachments, as well as copying, forwarding, printing, and disseminating any information related to this email is prohibited, and that you should not take any action based on the content of this email and/or its attachments.